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 CLERK U S DISTRICT COURT DISTRICT OF ARIZONA
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UNITED STATES DISTRICT COURT
 DISTRICT OF ARIZONA

DEFENSE'S EXHIBIT LIST

Carrie Ferrara Clark

PLAINTIFF

V.

City of Tucson

DEFENDANT

CASE NUMBER: 4:14-cv-02543

PRESIDING JUDGE Hon. Cindy K. Jorgenson	COURTROOM DEPUTY Sandra G. Fuller	COURT REPORTER Cheryl Cummings
HEARING/TRIAL DATE(S) 04/01/19-04/05/19 04/08/19-04/12/19	PLAINTIFF ATTORNEY(S) Jeffrey Jacobson	DEFENDANT ATTORNEY(S) Michelle Saavedra Renee Waters

PLF NO.	DFT NO.	DATE ADMITTED	EXHIBITS
	300		Daily Bulletin # 815
	301		Daily Bulletin # 830
	302	4/5/19	L'Heureux Text Messages
	303		TFD Employee Personnel Record Update Jeffery Todd
	304	4/5/19	Carrie Clark Station History
	305		Station 9 Dormitory Room Photograph taken May 2, 2016 by JoAnn Acosta
	306		Map Quest of Mother's address to Station 6
	307		Map Quest of Mother's address to Station 9
	308		Map Quest of Mother's address to Station 12
	309		Map Quest of Mother's address to Station 16
	310		Map Quest of Mother's address to Station 20
	311		Map Quest of Carrie Clark's address to Station 6
	312		Map Quest of Carrie Clark's address to Station 9
	313		Map Quest of Carrie Clark's address to Station 12
	314		Map Quest of Carrie Clark's address to Station 16
	315		Map Quest of Carrie Clark's address to Station 20
	316		Map Quest of Carrie Clark's address to Station 23
	317		Office of Equal Opportunity (OEOP) File
	318		Carrie Clark OEOP Interview Audio January 7, 2013
	319		Carrie Clark OEOP Interview Transcript January 7, 2013
	320		Carrie Clark OEOP Interview Audio January 16, 2013
	321		Carrie Clark OEOP Interview Transcript January 16, 2013

EXHIBIT LIST -- CONTINUATION

vs.			CASE NO.
PLF NO.	DFT NO.	DATE ADMITTED	EXHIBITS
	322		Carrie Clark OEOP Telephone Call Audio March 8, 2013 Part 2
	323		Carrie Clark OEOP Telephone Call Audio March 8, 2013 Part 1
	324		Carrie Clark OEOP Telephone Call Transcript March 8, 2013 Parts 1 & 2
	325		Carrie Clark OEOP Telephone Call Audio March 12, 2013
	326		Carrie Clark OEOP Telephone Call Transcript March 12, 2013
	327		Rick L'Heureux OEOP Interview Audio March 22, 2013
	328		Rick L'Heureux OEOP Interview Transcript March 22, 2013
	329	4/5/19	Phone records regarding March 20, 2013 phone call
	330		Rob Rodriguez Supervisory File
	331		Rob Rodriguez Supervisory File Privilege Log
	332		Work orders for Station Locks
	333		Arizona Civil Rights Division File
	334		Carrie Clark voice mail to Thomas regarding training September 10, 2013
	335		Carrie Clark voice mail to Thomas regarding training screen shot September 10, 2013
	336		Carrie Clark voice mail to Travis regarding trade September 16, 2013
	337		Carrie Clark voice mail to Travis regarding trade screen shot September 16, 2013
	338		Gordon Clark email to Laura Baker regarding trade
	339		Gordon Clark email to Laura Baker regarding trade retain properties
	340	4/9/19	Ted McDonough Memo to Chief Nofs regarding drill May 22, 2014
	341		Ted McDonough Memo to Chief Nofs regarding drill May 22, 2014 document properties
	342	4/9/19	Ted McDonough Memo to Chief Nofs regarding Garbage Truck Fire May 20, 2014
	343		Ted McDonough Memo to Chief Nofs regarding Garbage Truck Fire May 20, 2014 document properties
	344		Carrie Clark Memo to Chief Nofs regarding May 22, 2014
	345		Carrie Clark Engine 6 Fire Memo from Gordon Clark's Computer
	346		Carrie Clark Engine 6 Fire Memo from Gordon Clark's Computer retain properties
	347		Employee Counseling
	348	4/10/19	Carrie Clark Telestaff, June, 2014
	349		Carrie Clark Telestaff, October 2013-June 2014
	350		JoAnn Acedo email to Carrie Clark regarding assistance from Gordon Clark's Computer
	351		JoAnn Acedo email to Carrie Clark regarding assistance from Gordon Clark's Computer retain properties
	352		Gordon Clark email to Chief Gulotta re leave from Gordon Clark's Computer

EXHIBIT LIST -- CONTINUATION

Carrie Ferrara Clark		vs. City of Tucson		CASE NO. 4:14-cv-02543
PLF NO.	DFT NO.	DATE ADMITTED	EXHIBITS	
	353		Gordon Clark email to Chief Gulotta re leave from Gordon Clark's Computer properties	
	354		Arizona Daily Star Article Comments	
	355		Clark v. Clark Petition for Dissolution of Marriage	
	356		Carrie Clark HR Personnel File	
	357		Carrie Clark TFD Personnel File	
	358		Carrie Clark TFD Medical File	
	359		Carrie Clark HR Medical File	
	360		Paul McDonough Memo regarding response to discovery	
	361		Email and Memos regarding PEPP	
	362		JoAnn Acosta File regarding Carrie Clark	
	363		JoAnn Acosta File regarding Carrie Clark privilege log	
	364		Carrie Clark Wrongful Conduct Complaint March 9, 2016	
	365		Carrie Clark Memo regarding incident with Nikki Sprenger	
	366		Carrie Clark Memo regarding incident with Nikki Sprenger retain properties	
	367		John Vincent email to Ken Brouillette regarding Carrie Clark incident with Nikki Sprenger	
	368		John Vincent email to Ken Brouillette regarding Carrie Clark incident with Nikki Sprenger properties	
	369		Langejans Complaint	
	370		Education Counseling	
	371		Laura Baker Memo to Chief Critchley regarding Wrongful Conduct Complaint #WC 16-03-001	
	372		Laura Baker Memo to Chief Critchley regarding Wrongful Conduct Complaint #WC 16-03-001 privilege log	
	373		Mike Carsten Memo to Chief Baker regarding Inspector Clark Meeting	
	374	4/9/19	Carrie Clark Reassignment	
	375		Mike Garcia email to Carrie Clark regarding return to operations	
	376		JoAnn Acosta email to Carrie Clark re Off the Job Light Duty	
	377		Carrie Clark Light Duty Work Assignment Form	
	378		Carrie Clark TFD Personnel File updated 2016	
★	379	4/10/19	Mike Garcia email to Carrie Clark regarding interest in paramedic promotion	
	380		Work Status Verification	
	381		Carrie Clark TFD Personnel File updated 2017 Part 1	
	382		Carrie Clark TFD Personnel File updated 2017 Part 2	
	383		Retained documents from Carrie Clark's computer	

★ 379 ADMITTED SUBJECT TO REDACTION

EXHIBIT LIST -- CONTINUATION

Carrie Ferrara Clark			vs. City of Tucson	CASE NO. 4:14-cv-02543
PLF NO.	DFT NO.	DATE ADMITTED	EXHIBITS	
	384		Retained documents from Gordon Clark's computer	
	385		TFD Shift Calendars 2012 - 2017	
	386		TFD Station Map	
	387		TFD Manual of Operations	
	388		City of Tucson Wrong Conduct Administrative Directive	
	389		City of Tucson Discrimination Administrative Directive	
	390		TFD Battalion Grid Map	
	391	4/10/19	TFD Organization Chart Revised July 2, 2012	
	392	4/10/19	TFD Organization Chart Revised August 20, 2013	
	393	4/10/19	TFD Organization Chart Revised August 21, 2014	
	394	4/10/19	TFD Organization Chart Revised TFD Fiscal year 15/16	
	395	4/10/19	TFD Organization Chart Revised March 3, 2016	
	396		TFD Annual Report Fiscal Year 2015	
	397		TFD Annual Report Fiscal Year 2016	
	398		Mike Garcia Master Memo regarding 2016 Seniority within Rank Report	
	399		Mike Garcia Master Memo regarding 2016 Seniority within Rank Report List	
	400		Mike Garcia Master Memo regarding 2016 Seniority within Rank Report Amended	
	401		Carrie Clark Wrongful Conduct Complaint June 7, 2016	
	402		Carrie Clark TFD Medical File updated 2017	
	403		Well America Medical Records	
	404		Tanque Verde Family Practice Medical Records	
	405		Video Deposition transcript with exhibits, Carrie Clark 1	
	406		Video Deposition transcript with exhibits, Carrie Clark 2	
	407		Video Deposition transcript with exhibits, Carrie Clark 3	
	408		Video Deposition transcript with exhibits, Carrie Clark 4	
	409		Video Deposition transcript with exhibits, Gordon Clark 1	
	410		Video Deposition transcript with exhibits, Gordon Clark 2	
	411		Video Declaration of Carrie Clark dated August 17, 2017	
	412		Declaration of Gordon Clark dated August 16, 2017	
	413		Supplemental Declaration of Carrie Clark dated September 18, 2017	
	414		Supplemental Declaration of Gordon Clark dated September 18, 2017	

EXHIBIT LIST -- CONTINUATION

Carrie Ferrara Clark		vs. City of Tucson		CASE NO. 4:14-cv-02543
PLF NO.	DFT NO.	DATE ADMITTED	EXHIBITS	
	415		Plaintiff's Response to Defendant's Second Request for Production & PL000076-PL000117	
	416		Sharon McDonough email to Carrie Clark regarding demotion	
	417	4/8/19	JoAnn Acosta email to Carrie Clark regarding demotion	
	418		Carrie Clark Paramedic Assignment Pay Form	
	419		Carrie Clark Notes	
	420		Nate Weber email to Carrie Clark regarding demotion	
	421		Notes regarding telephone conversation between Ed Nied and Gordon Clark	
	422		Gordon Clark email to Laura Baker	
	423		JoAnn Acosta email to Carrie Clark regarding demotion	
	424	4/8/19	Exhibit 362, JoAnn Acosta File, bates COT2009, JoAnn Acosta email dated July 19, 2013	
	425	4/8/19	Exhibit 333, Arizona Civil Rights Division File, bates COT0434, JoAnn Acosta Memo dated August 30, 2013	
	426	4/8/19	Exhibit 333, Arizona Civil Rights Division File, bates COT0435, JoAnn Acosta email dated October 25, 2013	
	427	4/8/19	Exhibit 333, Arizona Civil Rights Division File, bates COT0436, Tim Nofs email dated November 4, 2013	
	428	4/8/19	Exhibit 333, Arizona Civil Rights Division File, bates COT0437, Rob Rodriguez memo dated November 4, 2013	
	429	4/8/19	Exhibit 362, JoAnn Acosta File, bates COT1971, 2202, 2203, 2007, 1999, Emails from JoAnn Acosta to Carrie Clark	
	430	4/8/19	City of Tucson Administrative Directive Leave for Witness/Jury Duty, etc. 2.01-7K	
	431	4/9/19	Exhibit 333, Arizona Civil Rights Division File, bates COT0315, Jim Critchley response to OEOP dated May 13, 2013	
	432	4/9/19	Exhibit 333, Arizona Civil Rights Division File, bates COT0406-0408, Rob Rodriguez Memo dated May 23, 2013	
	433	4/10/19	Exhibit 330, Rob Rodriguez Supervisory File, bates COT2859, Rob Rodriguez Notes	
	434	4/10/19	Exhibit 387, TFD Manual of Operations, bates COT1002-1003, TFD MOPS Section 203, Absences	
	330	4/4/19	Exhibit 330, Rob Rodriguez Supervisory File, bates COT2937, DB#706 and DB#707	
	333	4/4/19	Exhibit 333, Arizona Civil Rights Division File, bates COT0396- 0000 ^{399 CS&F} , Brian Stevens Email and Recommendation	
	333A	4/4/19	Exhibit 333, Arizona Civil Rights Division File, bates COT0403-404, Ed Nied Memo dated May 20, 2013	
	387	4/5/19	Exhibit 387, TFD Manual of Operations, bates COT1007-1010, Light Duty	
	387	4/5/19	Exhibit 387, TFD Manual of Operations, bates 0976, Voluntary "Swapping" of Positions	
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